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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
FOR THE WESTERN DIVISION

VIVIAN BERT, et al., : CASE NO. 1:02cv00467
Plaintiffs, : Judge Beckwith
v. :
AK STEEL CORPORATION, :
Defendant. :

Deposition of MARY L. HARRIS, taken on
Tuesday, June 5, 2007, commencing at 2:04 p.m., at
the offices of Taft, Stettinius & Hollister LLP,
425 Walnut Street, Suite 1800, Cincinnati, Ohio,
before Susan M. Barhorst, Notary Public.

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1 Q. You understood that you were signing
2 these documents, the ones that you signed under
3 penalty of perjury?

4 A. I don't -- make me -- I don't
5 understand your question. What do you mean? I
6 don't understand the question.

7 Q. If you look at page 27. Okay. Are
8 you on page 27?

9 A. Yes.

10 Q. Right above your and your husband's
11 signature, it says, "I declare under penalty of
12 perjury that I have read the foregoing summary and
13 schedules, consisting of 26 sheets, and that they
14 are true and correct to the best of my knowledge,
15 information, and belief." You saw that and signed
16 it, correct?

17 A. I saw it and I signed it, yes.

18 Q. Okay. And you did not disclose to the
19 bankruptcy court or to the bankruptcy trustee that
20 you had a lawsuit filed against AK Steel, correct?

21 A. I didn't know. I -- I wasn't aware
22 that I was supposed to. I -- I didn't know.
23 That's the only thing I can say. I didn't do it
24 intentionally. I didn't know. I didn't know that

1 was considered. I didn't know that.

2 Q. And on page 29, number four says --
3 this is at the very top, "List all suits and
4 administrative proceedings to which the debtor,"
5 which is you, "is or was a party within one year
6 immediately preceding the filing of this bankruptcy
7 case."

8 And there's two lawsuits filed there,
9 listed there, but the one against AK Steel is not
10 listed, correct?

11 A. It's not listed, that's correct --

12 Q. Okay.

13 A. -- because I didn't know that that
14 should have been listed.

15 Q. But you knew these other two should?

16 A. Well, I didn't list that. The
17 attorney did that.

18 Q. Well, how did he know about these
19 other two lawsuits?

20 A. I didn't think the Cincinnati Gas and
21 Electric was a lawsuit. But I -- I -- the only
22 thing I knew was -- that I knew was Wells Fargo. I
23 knew I was losing my home. I knew that. So I -- I
24 just didn't know. I just didn't -- I didn't.